



Direct Dial Number:  
(281) 658-9060

Author's E-mail Address:  
lmurphy@mbssmartlaw.com

May 9, 2025

Hon. Douglas L. Micko  
United States District Court  
316 N. Robert Street  
Courtroom 6B  
St. Paul, MN 55101

Re: *Vivorte, Inc. v. Gill*, No. 24-cv-01040-DWF-DLM  
Parties' Joint Scheduling Letter

Dear Judge Micko:

Pursuant to the Court's order, this letter is submitted on behalf of Plaintiff and Defendant to advise the Court of the parties' agreement on a proposed schedule moving forward. The parties propose the following schedule:

- July 18, 2025 – Defendant Gill will produce information and documents, if any, as ordered by the Court following the July 2, 2025 hearing.
- July 28, 2025 – Defendant Gill will appear for deposition.
- August 18, 2025 – Dispositive motion deadline
- Trial ready date to be set by Court

This joint letter is submitted with the full agreement of Defendant's counsel and is served on all counsel on May 9, 2025 via the Court's ECF system.

Respectfully submitted,

/s/ Land Murphy

Land Murphy  
Counsel for Plaintiff